

From: [Eberhardt, Maja](#)
To: ctanaka@sbtribes.com
Subject: RE: Shoshone-Bannock Tribes WQS
Date: Friday, November 08, 2019 4:11:00 PM
Attachments: [2019-09-25 SBT WQS EPA cmts 11-08-2019.docx](#)

Hi Candon,

Thanks for sending over your pre-proposal draft WQS for our review. Our review comments are attached. The following people reviewed the WQS and provided comments:

HQ: Sarah Ludwig-Monte, Karen Kesler, and Erica Fleisig

R10: Lon Kissinger for HHC

Lindsay Guzzo for NPDES-related language (variance and compliance schedule authorizing provisions)

Rochelle Labiosa for ALC for phosphorus, temperature, and DO. She and I are meeting next Wednesday for a detailed review, we are likely to have additional comments on the temperature and DO criteria.

I also reviewed the WQS and provided additional comments, and reviewed all comments and edits from others, added edits where I could for general comments made by others, and clarified or summarized others' comments rather than providing them directly when this seemed beneficial. And I consulted with Brian Nickel on one provision. He pointed out that general NPDES permits are in effect for SBT waters, including storm water permits and occasionally, construction permits. Lon provided a number of comments on the HHC table that drive at the need to provide a table of toxicity values and other inputs for the HHC calculations. I left these in for the most part, but am committed to supporting or taking care of that effort, since the HHC table was generated using the EPA "Tools for Tribes" calculator and additional recommendations we provided separately. Let me know if you have generated an HHC inputs table, though, and we can go with that. The inputs table will be needed at the latest when we prepare our action document, but you could consider including it with the public notice materials for the WQS to provide the scientific basis for the criteria. Please let me know your thoughts on that.

You'll also see some recurring themes, such as revisions to language that could allow natural conditions to supplant numeric criteria without a rulemaking process, and references to the formal rulemaking process when a provision addresses a formal revision.

Congratulations on putting the draft together! This is a large accomplishment. I hope our comments are helpful and that the suggested edits expedite revisions, as we discussed. If we missed the mark or you disagree with any edits, please let me know. Let's schedule a call to discuss the comments when you have had a chance to go through them. Happy to look over any individual revisions if you would like a quick review. Please keep me posted on your schedule so I can try to plan accordingly, and please plan to provide the public notice version of the WQS to us as early as possible.

Thanks, looking forward to seeing the WQS proposal go out to public comment! Let me know if I can do anything else to help.

Maja

From: Candon Tanaka <ctanaka@sbtribes.com>
Sent: Thursday, September 26, 2019 8:34 AM
To: Eberhardt, Maja <eberhardt.maja@epa.gov>
Cc: Spence Ward <sward@sbtribes.com>
Subject: Shoshone-Bannock Tribes WQS

Hello Maja,

I have attached the most recent version of the Tribes' WQS. This version includes the new footnote in the selenium aquatic life criteria and inclusion cyanotoxins in the recreation criteria. Please let me know as soon as possible on the review or any questions.

Thanks,

Candon Tanaka

Water Quality Specialist

Shoshone-Bannock Tribes

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